Before the

Federal Communications Commission

Washington, D.C. 20554

In the Matter of	)	
Delete Delete Delete	)	GN Docket No. 25-133

COMMENTS OF

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On March 12, 2025, the Federal Communications Commission requested input from the public "on deregulatory initiatives that would facilitate and encourage American firms' investment in modernizing their networks, developing infrastructure, and offering innovative and advanced capabilities." As a longtime radio broadcast engineer of 28 years and owner of commercial radio stations, I would like to propose the following changes to existing FCC rules:

1. **§ 74.1231(b)**

   The following language should be removed entirely from this section:

   However, an FM translator providing fill-in service may use any terrestrial facilities to receive the signal that is being rebroadcast. An FM booster station or a noncommercial educational FM translator station that is operating on a reserved channel (Channels 201-220) and is owned and operated by the licensee of the primary noncommercial educational station it rebroadcasts may use alternative signal delivery means, including, but not limited to, satellite and terrestrial microwave facilities. Provided, however, that an applicant for a noncommercial educational translator operating on a reserved channel (Channel 201-220) and owned and operated by the licensee of the primary noncommercial educational AM or FM station it rebroadcasts complies with either paragraph (b)(1) or (b)(2) of this section

   This rule is unnecessarily complicated and can pose challenges for certain operators of translators who would be forced to receive and retransmit signals of potentially poor quality. As the number of translators has increased, especially in metropolitan areas, the use of over the air reception is very difficult in many cases. There are many means of delivering audio to remote sites with extremely high quality and very low error rates…and those should be available as a means to feed any translator. As such, I would suggest the above language be replaced with simply:

FM translators may use any means to receive the signal that is being rebroadcast.

2. **§ 74.1231(f)**
   The following section should be deleted:
   A locally generated radio frequency signal similar to that of an FM broadcast station and modulated with aural information may be connected to the input terminals of an FM translator for the purpose of transmitting voice announcements. The radio frequency signals shall be on the same channel as the normally used off-the-air signal being rebroadcast. Connection of the locally generated signals shall be made by any automatic means when transmitting originations concerning financial support. The connections for emergency transmissions may be made manually. The apparatus used to generate the local signal that is used to modulate the FM translator must be capable of producing an aural signal which will provide acceptable reception on FM receivers designed for the transmission standards employed by FM broadcast stations.

   Generating a local RF signal in order to originate content on an FM translator is extremely cumbersome and should not be required in order to provide limited programming on any translator. The vast majority of transmission equipment used for FM translators in 2025 has the capability of accepting various audio inputs from analog left and right to AES digital to composite…any of these methods should be more than acceptable for originating limited content on a translator.

3. **§ 74.1231(g)**
   This section should also be removed/modified:
   The aural material transmitted as permitted in paragraph (f) of this section shall be limited to emergency warnings of imminent danger and to seeking or acknowledging financial support deemed necessary to the continued operation of the translator. Originations concerning financial support are limited to a total of 30 seconds an hour. Within this limitation the length of any particular announcement will be left to the discretion of the translator station licensee. Solicitations of contributions shall be limited to the defrayal of the costs of installation, operation and maintenance of the translator or acknowledgements of financial support for those purposes. Such acknowledgements may include identification of the contributors, the size or nature of the contributions and advertising messages of contributors. Emergency transmissions shall be no longer or more frequent than necessary to protect life and property.

   This complicated section is referring to originating content on an FM translator and is unnecessarily limiting to translator owners. In the original context of this rule, it may be safe to assume that a 30 second message per hour would have been enough to solicit financial support to pay the costs mentioned, but I would argue that in 2025 that simply is not the case. There are numerous expenses involved in the operation of translators including tower leases, electricity, maintenance, insurance, and more. This section should be simplified to allow translator owners the greatest amount of flexibility regarding the origination of programming as necessary and should be worded as such:

Aural material differing from the translator's primary station, subject to all rules regarding content of the primary station, shall be permitted at the discretion of the translator station licensee, limited to a total of 10 minutes per hour.

4. **§ 74.1204(a)(1), § 74.1204(a)(2), and § 74.1204(a)(3)**
   This section outlines the predicted field contours of an FM translator and the prohibited overlap with other full service FM stations and translators. In each of these sections, the 400 kHz/ 600 kHz interference specifications should be deleted. This requirement is very unnecessary in the modern age given the inherent low power nature of translators and their extremely minimal impact to FM reception on 2nd and 3rd adjacent channels. Generally speaking, modern FM receivers have little issue with stations that are 400kHz or 600kHz apart, and translator licensees often suffer a financial burden from having to install expensive multi-bay antenna arrays to simply satisfy this requirement.

5. **FCC 15-142 MB Docket No. 13-249 Paragraph 17**
   While this is really only one sentence in the entire AM Revitalization Report and Order document, it is extremely significant. Translators that were granted in the final window of the AM revitalization would be permanently tied to the AM parent they were granted to rebroadcast. Much has changed in the landscape of FM translators since these final construction permits were granted in 2018, and the expectation to keep these translators tied to the AM originally assigned is very limiting to financial viability for broadcasters in many cases. As such, this language should be deleted:

   "and any translator acquired through the FM translator auction windows will be permanently linked to the AM primary station acquiring it."

   All FM translator licensees should be allowed to utilize any parent station for rebroadcast, regardless of how that translator was originally obtained.

6. **§ 73.1560(b)**
   In this section:
   FM stations. Except as provided in paragraph (d) of this section, the transmitter output power of an FM station, with power output as determined by the procedures specified in § 73.267, which is authorized for output power more than 10 watts must be maintained as near as practicable to the authorized transmitter output power and may not be less than 90% nor more than 105% of the authorized power. FM stations operating with authorized transmitter output power of 10 watts or less, may operate at less than the authorized power, but not more than 105% of the authorized power.

   These few words should be deleted:
   "less than 90% nor"

   There are many situations in full power FM broadcasting where transmitter sites may be located on very high peaks or may provide excellent coverage of their service area even at a reduced

amount of power. It should be left to the broadcaster to understand their service area and what power is actually required to serve it adequately even if it means operating at less than 90% of licensed power. With the extremely competitive landscape radio faces in 2025 and beyond, every dollar counts, and high power sites can consume extreme amounts of energy which translates to very high costs in some cases. These operators should be able to choose to operate at a lower power level at will in order to curtail costs as necessary. Note that while I am proposing to delete the 'less than 90%', it would also be acceptable in my opinion to reduce that percentage rather than deleting entirely (perhaps to something like 25%).